

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

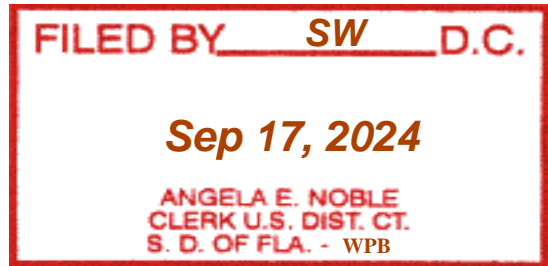
Case No. 24-mj-8448-WM

UNITED STATES OF AMERICA

v.

MARCOS GEOVANNY BELTRE OLIVO,

Defendant. /

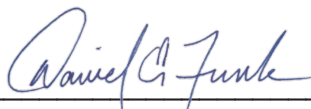


CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? ☐ Yes ☒ No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? ☐ Yes ☒ No
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? ☐ Yes ☒ No
4. Did this matter involve the participation of or consultation with now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? ☐ Yes ☒ No

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

BY: 

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UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

MARCOS GEOVANNY BELTRE OLIVO,

Defendant(s)

Case No. 24-mj-8448-WM

FILED BY SW D.C.

Sep 17, 2024

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - WPB

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of between Feb. 2024 and September 11, 2024 in the county of Palm Beach, Broward, Miami-Dade in the  
Southern District of Florida, the defendant(s) violated:

Code Section

21 U.S.C. §§ 841(a)(1), 841(b)(1)  
(B)(vi), and 846

Offense Description

Conspiracy to distribute a controlled substance (40 grams or more of a  
mixture or substance containing a detectable amount of fentanyl  
(N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propenamide)

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

  
Complainant's signature

Gregory Hoffman, FBI Special Agent

Printed name and title

Sworn to me via Telephone-FaceTime by the  
applicant in accordance with the requirements of  
Fed. R. Crim. P. 4(d) and 4.1.

Date: September 17, 2024

  
Judge's signature

City and state: West Palm Beach, FL

WILLIAM MATTHEWMAN, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Gregory Hoffman, being first duly sworn, hereby depose and state as follows:

**AGENT BACKGROUND AND INTRODUCTION**

1. The affidavit is submitted support of a criminal complaint charging MARCOS GEOVANNY BELTRE OLIVO (MARCOS BELTRE) with one count of conspiracy to distribute a controlled substance (40 grams or more of a mixture or substance containing a detectable amount of fentanyl (N-phenyl-N- [1-( 2-phenylethyl )-4-piperidinyl]propenamide)), in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(vi), and 846.

2. As a Special Agent of the FBI so employed since March 2016, I have been assigned to the West Palm Beach Resident Agency, Violent Crime Squad, since August 2016. My duties have included the investigation of several violent criminal offenses and the trafficking of narcotics through both conventional and non-conventional organizational means often coordinated through the internet. Several of these investigations have involved subjects engaged in the sale of narcotics through the dark web in addition to traditional drug organization investigations. I have received further specific training on dark web narcotics trafficking cases on several occasions.

3. Additionally, I have received training on narcotics trafficking and money laundering from the FBI and have been personally involved in investigations concerning the possession, manufacture, distribution, transportation, and importation of controlled substances both through the dark web and traditional methods, as well as methods used to finance drug transactions and launder drug proceeds. Through investigations and training, I have become familiar with narcotic traffickers' methods of operation including the distribution, storage, and transportation of narcotics, the collection of money that represents the proceeds of narcotics trafficking, and money laundering. These investigations have resulted in arrests of individuals who have smuggled, received, and distributed controlled substances, including, but not limited to,

methamphetamine, fentanyl, and other pharmaceuticals, as well as the arrests of individuals who have laundered proceeds emanating from those illegal activities. These investigations have also resulted in seizures of illegal drugs and proceeds from the distribution of those illegal drugs.

4. This affidavit is based on your affiant's personal knowledge and on information provided to your affiant by other law enforcement officers and witnesses. Not all the facts known to me have been included in this affidavit, but only such facts as are necessary to support a finding of probable cause for the issuance of a criminal complaint.

#### **PROBABLE CAUSE**

5. Federal agents are currently investigating individuals mailing controlled substances through the U.S. Postal System (USPS) from the Southern District of Florida and other locations in United States, as part of a larger investigation into the international, web-based, marketing and distribution of controlled substances. Drug trafficking organizations based outside the United States are employing and financially compensating individuals ("re-shippers") in the United States to package and mail parcels containing controlled substances to customers located in the United States. The drug trafficking organizations conduct marketing, take orders, and coordinate the fulfillment of orders, while the re-shippers conduct the physical packaging and shipping of the controlled substances. The drug trafficking organizations also pay individuals to open financial accounts and use cash applications for the purpose of carrying out financial transactions to further the drug distribution operation.

#### **Investigation of Mailers in Southern District of Florida**

6. In late March 2024, an FBI covert employee, sitting in the Southern District of Florida, in Palm Beach County, sent an email to a drug vendor asking whether the account owner

would sell Tramadol<sup>1</sup> to a U.S. customer. The vendor responded in the affirmative and, after several days, directed the cover employee to continue the conversation on Telegram or Skype.

7. On April 10, 2024, following a series of messages, the covert employee completed the purchase of 150 Tramadol pills from the vendor for \$330.00 worth of Bitcoin (cryptocurrency) and arranged for the pills to be mailed to a government-controlled mailbox outside the Southern District of Florida.

8. On April 17, 2024, agents received the parcel containing the pills ordered from the vendor at the mailing address provided to the vendor by the covert employee. On April 22, 2024, agents opened the parcel and found it contained a vacuum sealed plastic bag with pink pills matching those pictured above. These pills were recognized by their shape, color, and markings by your affiant from training/experience and with reference to Drugs.com to be a form of Tramadol. The pills will be submitted to the DEA Southeast Laboratory for chemical testing.

9. A review of USPS databases determined that the parcel shipped for the above-described order was sent from a USPS facility located at 500 S. Federal Highway, Hallandale Beach, Florida, on April 11, 2024, at 12:49 p.m. The mailer's image, later identified as MARCOS BELTRE, was recorded by USPS facility cameras during the time he mailed the parcel.

10. It should be noted that the parcel, despite being mailed from the facility in Hallandale, used a return address in West Palm Beach, Florida, that does not appear to exist. West Palm Beach and Hallandale Beach are approximately 55 miles away from each other. Based on my training and experience, I know that fake return addresses are used by mailers to hide their identity and the location from where the parcel was mailed.

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<sup>1</sup> Tramadol is a Schedule IV controlled substance in the United States which is produced in India and used as a painkiller.

11. Agents reviewed postal database information and photographs collected by USPS facility cameras and were able to identify other instances in which a person with the same appearance mailed parcels with the same characteristics as the drug parcel ordered by the OCE on April 10, 2024, and opened on April 22, 2024. The parcels used the same packaging and postage company, listed the same generic weight, and listed a return address a significant distance from the post office where the parcel was mailed.

12. On March 22, 2024, at approximately 7:48 p.m. a suspected drug parcel was mailed from 2200 N.W. 72nd Avenue in Miami, Florida, but listed a return address in West Palm Beach, Florida, which is approximately 72 miles away from Miami, Florida. The USPS parcel had characteristics common to the parcel referenced above and the physical appearance of the mailer matched the appearance of the person who mailed the parcel referenced above. The mailer's image captured by the USPS facility camera did not match the physical appearance of the individuals registered with the Florida Department of Highway and Motor Vehicles (DHSMV) at the return address listed on the parcel. The mailer's image, later identified as MARCOS BELTRE, was recorded by USPS facility cameras during the time he mailed the parcel.

13. On May 3, 2024, at approximately 3:21 p.m., a suspected drug parcel was mailed from the USPS facility located at 1801 Polk Street Hollywood, Florida 33022. The USPS parcel had characteristics common to the parcels referenced above and the physical appearance of the mailer matched the appearance of the person mailing the parcels referenced above. The parcel listed a return address in West Palm Beach, Florida, which is approximately 55 miles from Hollywood, Florida. The mailer's image captured by the USPS facility camera did not match the physical appearance of the individuals registered with the Florida Department of Highway and Motor Vehicles (DHSMV) at the return address listed on the parcel. The mailer's image, later

identified as MARCOS BELTRE, was recorded by USPS facility cameras during the time he mailed the parcel.

14. On May 3, 2024, at approximately 3:44 p.m., a suspected drug parcel was mailed from the USPS facility located at 500 S. Federal Highway, Hallandale Beach, Florida. The USPS parcel bore characteristics common to the parcels referenced above and the physical appearance of the mailer matched the appearance of the person mailing the parcels referenced above. The parcel listed a return address in West Palm Beach, Florida which is approximately 55 miles from Hallandale, Florida. The mailer's image captured by the USPS facility camera did not match the physical appearance of the individuals registered with DHSMV at the return address listed on the parcel. The mailer's image, later identified as MARCOS BELTRE, was recorded by USPS facility cameras during the time he mailed the parcel.

15. In each of the photographs depicted above the mailer can be seen holding a large stack of what appear to be USPS Flat Rate Envelopes, which is the same type of envelope used to send the drug parcel to the UCE in April of 2024. Furthermore, the two parcels mailed on May 3, 2024, were mailed from post offices less than 3 miles apart. Based on my training and experience, I am aware that drug traffickers using the US Postal Service often attempt to evade law enforcement interdiction efforts by using multiple post offices to make their shipments.

16. Ultimately, agents were able to initially identify the mailer referenced above as Marcos Geovanny BELTRE, a/k/a "Marcos Geovanny Beltre Olivo."

17. The images also resembled BELTRE's Florida Driver's License photograph which agents obtained from the DHSMV Driver and Vehicle Information Database (DAVID) system.<sup>2</sup>

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<sup>2</sup> "DAVID" is the Driver and Vehicle Information Database for Florida Department of Highway Safety and Motor Vehicles. Agents have access to the database for law enforcement purposes.

18. On May 21, 2024, as part of the investigation into the vendor, a FBI covert employee concluded a text exchange with the vendor on the Telegram messaging application in which the cover employee arranged to purchase Tramadol and Adderall for an agreed amount of Bitcoin (cryptocurrency). On May 28 and May 29, 2024, two parcels were received at the same undercover address provided to the vendor by the covert employee. Based on my training and experience, the pills appeared to have the same color, size, shape, and markings as Tramadol and Adderall.

19. According to USPS records, the parcel containing the purported Tramadol appears to have been mailed from the Southern District of Florida while the parcel containing the purported Adderall was mailed from outside Florida. Agents were unable to obtain photographs of who mailed the parcels. However, investigators noted that the purported Tramadol pills provided in the order matched the appearance of purported Tramadol pills ordered from the vendor and mailed by BELTRE on April 11, 2024.

20. Agents submitted the pills recovered from this order to the DEA Southeast Laboratory for chemical testing. The purported Tramadol pills were determined to contain the drug Bromazolam which is a controlled substance analogue.<sup>3</sup> The purported Adderall pills were determined to contain the drug fentanyl which is a Schedule II controlled substance.

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<sup>3</sup> An expert with the Drug Enforcement Administration, Diversion Control Division, Drug and Chemical Evaluation Section, in a written communication, stated that they can support Bromazolam as controlled substance analogue. The charge of possession with intent to distribute an analogue, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), requires the following proof: (1) the defendant knowingly possessed a controlled substance, even if he/she did not know its identity; (2) the defendant intended to distribute the controlled substance; (3) the substance has a chemical structure substantially similar to the chemical structure of a controlled substance classified under Schedule I or II; (4) the substance has an actual, intended, or claimed stimulant, depressant, or hallucinogenic effect on the central nervous system that is substantially similar to or greater than such effect produced by a Schedule I or II controlled substance; and (5) the substance was intended for human consumption.



21. On May 27, 2024, as part of the investigation into the vendor, a covert employee of the FBI conducted an exchange of emails an email. That email was obtained by investigators from emails previously exchanged with the vendor, which had been identified through analysis of the data obtained through a search warrant for a Google account. The cover employee communicated with a proton mail account associated with the vendor and arranged for the purchase of 100 Oxycodone M30 pills for \$330.00 of Bitcoin. In concluding the order, the seller provided a USPS tracking number to the cover employee.

22. On June 4, 2024, the order was received at an undercover location within Palm Beach County, in the Southern District of Florida. The parcel contained the purported Oxycodone pills, which were submitted to the DEA Southeast Laboratory for chemical testing and returned a positive result for N-Pyrrolidino Protonitazene which is a controlled substance analogue.<sup>4</sup> A review of USPS records indicated that the parcel was mailed on May 29, 2024, from the USPS Post Office at 9704 N.W. 17th Street, Doral, Florida 33172. A camera within the facility captured an image of Josue BALAGUER.

23. Josue BALAGUER, a/k/a Josue David BALAGUER Medina, (hereinafter BALAGUER) was developed as a suspect and later charged by criminal complaint with conspiring to distribute a controlled substance (24-8432-BER).

24. Agents obtained Josue BALAGUER's Florida Driver's License photograph from the DHSMV DAVID system.

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<sup>4</sup> An expert with the Drug Enforcement Administration, Diversion Control Division, Drug and Chemical Evaluation Section, in a written communication, stated that they can support N-Pyrrolidino Protonitazene as controlled substance analogue.

**Surveillance of Addresses Associated with BALAGUER and BELTRE**

25. Between the dates of May 13, 2024, and August 29, 2024, law enforcement conducted surveillance of two residences associated with BELTRE and BALAGUER. The surveillance was not continuous and took place on multiple days. The residences are approximately 0.4 miles apart. Both BELTRE and BALAGUER currently list their mailing address with DHSMV as 2539 Liberty Street, Hollywood, Florida (hereinafter 2539 Liberty Street). Until late May 2024, BELTRE had listed 2318 Scott Street, Hollywood, Florida (hereinafter “2318 Scott Street”) as his mailing address with DHSMV. During the time surveillance was conducted, BELTRE listed a residential address of 1463 NE 131st Street, North Miami, Florida 33161-4423. And BALAGUER maintained a residential address of 2539 Liberty Street, Hollywood, Florida.

26. On May 13, 2024, investigators began conducting surveillance at 2318 Scott Street. At approximately 10:52 a.m., a gray 2019 Dodge Charger registered to Josue BALAGUER with the State of Florida was observed parked at 2318 Scott Street. Later, while driving by the property at 12:52 p.m., agents observed that the vehicle had departed.

27. On May 20, 2024, investigators conducted surveillance at 2318 Scott Street and 2539 Liberty Street. At approximately 11:28 a.m., investigators observed BALAGUER’S Charger pull up to 2318 Scott Street and depart approximately two minutes later without anyone exiting or leaving the vehicle. Four minutes later, BALAGUER’S Charger was observed at 2539 Liberty Street where it stayed until approximately 12:27 p.m.

28. On May 29, 2024, BELTRE changed his mailing address with the Florida DHSMV to 2539 Liberty Street, Hollywood, Florida.

29. On May 29, 2024, investigators conducted surveillance at 2539 Liberty Street and the 2318 Scott Street residences. At approximately 10:30 a.m., investigators observed a red Ford F-150 parked in front of 2539 Liberty Street. This tag is registered to BELTRE for the red Ford

F-150. At approximately 10:33 a.m., BELTRE was observed exiting 2539 Liberty Street, entering BELTRE's F-150, and departing.

30. On the same date, May 29, 2024, at approximately 11:00 a.m., BALAGUER's Charger was observed at 2318 Scott Street. At 11:15 a.m., BELTRE's F-150 was observed back at 2539 Liberty Street with BELTRE being observed in the front driveway 15 minutes later. Over approximately the next hour, multiple individuals, including JOEL MEDINA (MEDINA) and another known resident of 2318 Scott Street, were observed parked in front of and going into 2539 Liberty Street. At approximately 12:33 p.m., the individuals, including MEDINA, exited the residence with BELTRE and spoke in front of 2539 Liberty Street. Some of the individuals departed in their vehicles while BELTRE and others remained at the residence.

31. On June 26, 2024, surveillance was again conducted at 2539 Liberty Street. At approximately 11:25 a.m., BELTRE was observed departing 2539 Liberty Street, entering BELTRE's F-150, and proceeding directly to a Post Office on Polk Street in Hollywood, Florida. BELTRE was observed entering the facility and leaving with a stack of USPS cardboard mailer envelopes of the type used to package and mail the drug orders made during this investigation. BELTRE then returned directly to 2539 Liberty Street. BELTRE was observed wearing glasses.

32. At approximately 12:31 p.m., BELTRE and BALAGUER were observed meeting with and talking to an unidentified male in front of 2539 Liberty Street. BELTRE was observed bringing an unknown number of large boxes from the male's vehicle into 2539 Liberty Street.

33. At approximately 12:55 p.m., BELTRE was observed leaving 2539 Liberty Street in BELTRE's F-150 and entering 2318 Scott Street with several USPS mailer envelopes in his hands. BELTRE appeared to remain there until at least 4:45 p.m. when surveillance was terminated.

34. On July 17, 2024, BALAGUER entered his vehicle and proceeded in a circuitous route to the USPS Post Office at 7972 Pines Blvd. Pembroke Pines, Florida, which is located approximately 4 miles away. BALAGUER exited his vehicle with multiple USPS parcels visible in his hands and entered the facility. Approximately ten minutes later, agents entered the facility and recovered 9 parcels from the mail-drop slot area that matched the description of the size and type carried by BALAGUER into the facility. In recovering the parcels from the USPS facility, investigators noted that there were few parcels matching the dimensions and type carried by BALAGUER in the drop off bin. BALAGUER departed the facility and headed east back in the direction of his home in Hollywood, Florida. The parcels bore the following return addresses:

- a. Seven parcels bore the return address of “BEST BUY \*\*3 Herod St. Lewisville, TX 75057-3103.” A Google search of this street address returned a result for a residential duplex in Lewisville, TX and not a Best Buy company. These parcels were all paid for using Stamps.com postage.
- b. Two parcels bore return addresses that come back to residential homes in Miami, Florida, but also list names of persons that a CLEAR commercial database records check does not link the listed addresses. Furthermore, a Florida DHSMV DAVID database check returned no results for the listed names nor any close matches for those names at the listed addresses.

35. On July 18, 2024, pursuant to a search warrant signed by the Honorable Judge William Matthewman (24-mj-8350-WM), agents opened the seized parcels. Within the parcels, agents recovered a total of approximately 234.4 grams of white oblong pills printed with “M367,” 277 grams of yellow oblong pills marked with “E 712,” and 69.2 grams of round blue pills marked

with “M 30.”<sup>5</sup> From training, experience, and referring to Drugs.com, I am aware that the white pills are purportedly Acetaminophen and Hydrocodone Bitartrate, which is a Schedule II narcotic analgesic combination. I am similarly aware that the yellow pills are purportedly Acetaminophen and Oxycodone, which is a Schedule II narcotic analgesic combination. Finally, I am similarly aware that the blue pills are purportedly Oxycodone Hydrochloride, which is a Schedule II opioid. Your affiant is also aware that Oxycodone pills are often counterfeited by drug traffickers with various opiates such as fentanyl. Chemical testing on these seized narcotics is pending.<sup>6</sup>

36. On July 30, 2024, USPIS personnel noted that a USPS system reflected that four parcels were in transit to “Marcos Beltre” at 2318 Scott Street. Each of the parcels had a listed weight of approximately four pounds. Upon intercepting the parcels, investigators noted that the exterior of the boxes and their postage label information indicated that each of the four boxes contained one hundred (100) 9.5 inch by 12.5 inch USPS Padded Flat Rate Envelopes. These types of envelopes can be ordered by the public from USPS.com. These envelopes are the same size, although a marginally different type, as the envelopes previously used by the mailers of @AKgenerics orders. Investigators returned the boxes to the mail stream for delivery to 2318 Scott Street.

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<sup>5</sup> These approximate weights include the vacuum sealed packaging used by the drug traffickers who packaged the pills for shipment. Such packaging would add several grams to the approximate weights.

<sup>6</sup> It should be noted that various other drug purchases were made from @AKgenerics and ankitasudhirkeer@proton.me which did either not produce direct evidence implicating BELTRE and **BALAGUER** or produced evidence indicating that a third person conducted the suspected mailing. For instance, some orders or portions of orders from @AKgenerics were mailed from areas outside of the Southern District of Florida. Based on the broader investigation, agents believe the @AKgenerics drug trafficking organization utilizes re-packagers located across the United States. Furthermore, because of communications with federal agents outside of the Southern District of Florida conducting independent investigations, agents believe it is possible that BELTRE and **BALAGUER** may fill orders for more than one internet-based drug trafficking enterprise.

37. On August 7, 2024, at approximately 1:33 p.m., agents observed a USPS employee drop off a parcel later confirmed through USPS records to be one of the four parcels containing one hundred (100) 9.5 inch by 12.5 inch USPS Padded Flat Rate Envelopes addressed to BELTRE which were viewed by postal inspectors on July 30. Agents observed the postal carrier put the parcel to the left of the door at 2318 Scott Street. At approximately 2:37 p.m., MEDINA. arrived home in his vehicle and enter 2318 Scott Street.<sup>7</sup> At approximately 2:42 p.m., agents visually confirmed that the parcel was no longer outside of the residence. At approximately 3:16 p.m., MEDINA. was observed departing 2318 Scott Street in his vehicle with no parcel visible in his hands. MEDINA. departed the area and agents confirmed that he did not go to the 2539 Liberty Street residence shared by BALAGUER and BELTRE. At 3:19 p.m., agents confirmed that the vehicles used by BALAGUER and BELTRE were all present at 2539 Liberty Street.

### **VEHICLE TRACKING DATA**

#### **Beltre's F-150**

38. Agents obtained a warrant to track the red F-150 owned by BELTRE (24-mj-8370-WM). On August 9, 2024, the BELTRE's F-150 left 2539 Liberty Street and proceeded directly to 2318 Scott Street at approximately 5:30 p.m. It remained there before returning to 2539 Liberty Street at approximately 6:42 p.m. The following day, BELTRE's F-150 visited boat ramps several times before being parked for several days at an autobody shop in Hollywood, Florida. This leads agents to believe that there are mechanical issues with the vehicle which limited its use. BELTRE's F-150 eventually returned to 2539 Liberty Street but has moved sparingly since then. However, the tracker was observed going to the area of 2318 Scott Street on August 9, August 18,

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<sup>7</sup> MEDINA. lists 2318 Scott Street as his residential address with Florida DHSMV.

August 26, and August 27. Much of the time, the tracker remained in the vicinity of 2539 Liberty Street.

39. On August 18, 2024, BELTRE's F-150 departed 2539 Liberty Street at approximately 3:18 p.m. and proceeded to a nearby shopping plaza before going to 2318 Scott Street, arriving at approximately 3:24 p.m. The vehicle remained at 2318 Scott Street until approximately 5:55 p.m. when it departed back the same plaza and then on to 2539 Liberty Street, arriving at approximately 6:03 p.m.

40. On August 26, 2024, BELTRE's F-150 departed 2539 Liberty Street at approximately 1:41 p.m. and proceeded to 2318 Scott Street. The vehicle remained at 2318 Scott Street until approximately 3:56 p.m. when it returned to 2539 Liberty Street.

41. On August 27, 2024, BELTRE's F-150 departed 2539 Liberty Street at approximately 12:36 a.m. and proceeded to 2318 Scott Street. The vehicle remained at 2318 Scott Street until approximately 3:21 p.m. when it returned to 2539 Liberty Street.

#### **BALAGUER'S Charger**

42. On August 14, 2024, BALAGUER'S Charger departed 2539 Liberty Street and went to 2318 Scott Street at approximately 2:32 p.m. before proceeding to I-95 northbound at approximately 3:00 p.m. The vehicle stopped at three USPS post offices, including one located at 170 NE Second Street, Boca Raton, Florida. USPS facility cameras from inside the post office captured BALAGUER depositing twenty-one USPS priority flat envelopes into a USPS blue collection bin. After depositing the parcels, BALAGUER drove away from the USPS facility. The parcels were removed from the blue collection bin and secured. BALAGUER'S Charger then returned to 2539 Liberty Street before proceeding to 2318 Scott Street at approximately 8:30 p.m. before returning to 2539 Liberty Street just after midnight.

43. USPIS personnel seized the 21 parcels and later opened them pursuant to a federal search warrant issued by the Honorable Judge Ryon M. McCabe (SDFL Warrant 24-mj-8391-RMM). Within the 21 parcels, agents recovered numerous pills packaged in vacuum sealed plastic which is consistent with illegal drug distribution. Results from the DEA Southeast Laboratory indicate that multiple types of pills found in the parcels contain fentanyl, heroin, and bromazepam. The following list includes a description of the appearance of the pressed pills, the purported type of pharmaceutical, and the total weight of the drugs found in the parcels (including the packaging weight):

- a. In 4 parcels, 309.6 grams of oblong yellow pills marked "E712." This pill bears the markings, color, size, and shape of Endocet, a Schedule II controlled substance;
- b. In 2 parcels, 25.6 grams of triangular white pills marked "p/d" and "8." This pill bears the markings, color, size, and shape of Hydromorphone, a Schedule II controlled substance;
- c. In one parcel, 42 grams of light blue pills marked "K25." This pill bears the markings, size, and shape of phentermine, a Schedule IV controlled substance. However, this pill differs from the color of phentermine in that it is light blue instead of white with blue specks. Your affiant believes, through training and experience, that this may be an artifact of the counterfeiting process;
- d. In 6 parcels, 91.6 grams of round blue pills marked "M/30." This pill bears the markings, color, size, and shape of Oxycodone, a Schedule II controlled substance;
- e. In 4 parcels, 271.4 grams of oblong white pills marked "M367." This pill bears the markings, color, size, and shape of Acetaminophen and Hydrocodone Bitartrate, a Schedule II controlled substance;



- f. In one parcel, 38.0 grams of oblong yellow pills marked “WATSON 853.” This pill bears the markings, color, size, and shape of Acetaminophen and Hydrocodone Bitartrate, a Schedule II controlled substance;
- g. In one parcel, 23.2 grams of round green pills marked “OP/80.” This pill bears the markings, color, size, and shape of Oxycontin, a schedule II controlled substance; and
- h. In one parcel, 33.2 grams of branded Belbien blister packs, a Schedule IV controlled substance.

44. Between August 23, 2024, and September 10, 2024, BALAGUER’S Charger regularly departed either 2318 Scott Street or 2539 Liberty Street and proceeded to at least one, but more often two or three, post offices in Broward or Dade Counties. Some post offices were frequently used while other post offices were rarely used. In my training and experience, your affiant is aware that individuals using the USPS mail system to distribute narcotics often vary their mailing practices to evade detection. This activity took place on weekdays and was not observed on weekends.

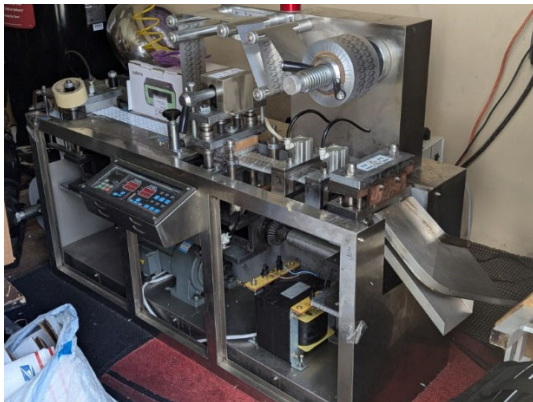
#### **Searches & Arrests on September 11, 2024**

45. On September 11, 2024, multiple federal agencies executed warrants at properties including 2318 Scott Street and 2539 Liberty Street. Within 2539 Liberty Street, agents recovered multiple evidence items. Specifically, within one room, agents recovered items leading to its identification as BELTRE’S bedroom. Within the room, agents found BELTRE’S Social Security Card, U.S. Naturalization Certificate, and U.S. Passport. Agents also recovered a label printer connected to a desktop computer. Within the room’s closet, agents recovered over 1000 unused USPS mailer envelopes, a box of pill bottles and a box of pill bottle lids, and a large box filled with purported Belbien which is the brand name of a Schedule IV controlled substance.

46. Within the apartment's living room, agents observed two unaffixed postal labels. One label featured "\*\*\*3 Herod St. Lewisville, TX 75057-3103" as a destination address and the other featured "\*\*\*3 Herod St. Lewisville, TX 75057-3103" as a return address. This address was previously used on seized drug parcels as a return address.

47. Outside of 2539 Liberty Street, agents observed BELTRE's F-150. Agents conducted a plain view observation of the items in the open-air truck bed. Agents observed many postal mailer envelopes soaked through with water as well as six blister packs of purported Belbien.

48. Agents searched the interior and exterior of 2318 Scott Street. In the backyard shed of the premises, agents found several hundred pounds of pills consistent in appearance with those encountered in this investigation as well as an industrial pill press and packaging machine. The pills were submitted to the DEA Southeast Laboratory for testing. See below photos:



### **CONCLUSION**

Based on the foregoing, your affiant respectfully submits that there is probable cause to believe MARCOS GEOVANNY BELTRE OLIVO (MARCOS BELTRE) has committed the criminal offense of conspiracy to distribute a controlled substance (40 grams or more of a mixture

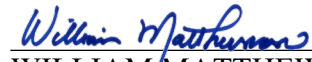
or substance containing a detectable amount of fentanyl), in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(vi), and 846.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

A handwritten signature in blue ink, appearing to read 'Gregory Hoffman', written over a horizontal line.

Gregory Hoffman  
Special Agent  
Federal Bureau of Investigation

Sworn and attested to me by applicant by  
telephone (Facetime) per the requirements  
of Fed.R.Crim.P. 4(d) and 4.1. on September 17th, 2024.

A handwritten signature in blue ink, appearing to read 'William Matthewman', written over a horizontal line.

WILLIAM MATTHEWMAN  
United States Magistrate Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** MARCOS GEOVANNY BELTRE OLIVO

**Case No:** 24 - mj - 8448 - WM

**Count #1:**

Conspiracy to distribute a controlled substance (40 grams or more of a mixture or substance containing a detectable amount of fentanyl (N-phenyl-N- [1-( 2-phenylethyl )-4 piperidinyl]propenamide) in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(vi), and 846

\* **Max. Term of Imprisonment:** 40 years

\* **Mandatory Min. Term of Imprisonment (if applicable):** 5 years

\* **Max. Supervised Release:** 4 years up to life

\* **Max. Fine:** \$5,000,000

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**\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**